



DEPARTMENT OF HEALTH & HUMAN SERVICES
Health Care Financing Administration

Center for Medicaid and State Operations
Family and Children's Health Programs Group
Division of Integrated Health Systems
7500 Security Boulevard
Baltimore, MD 21244-1850

FEB - 8 2001

Peggy L. Bartels, Administrator
Department of Health and Family Services
Division of Health Care Financing
1 West Wilson Street
P. O. Box 309
Madison, WI 53701-0309

Dear Ms. Bartels:

Thank you for your response of November 27, 2000, to questions we had on your Section 1115 demonstration proposal to provide family planning services.

Enclosed please find our additional comments and questions on your response. We are available for consultation if needed or to set **up** a conference call to assist your staff.

If you have any questions or need additional information, please contact Ms. Pamela Forton, Wisconsin Family Planning Project Officer, at HCFA's Central Office, (410) 786-1410.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Fiore", is written over the typed name.

Michael Fiore
Director

Enclosure

STATE OF WISCONSIN FAMILY PLANNING PROGRAM
Consolidated Team Comments on Wisconsin's Response of November 27, 2000

TARGET POPULATION

Response 3:

- Please provide updated, current statistics for the 12-month base period beginning April 1, 2000 through March 31, 2001 (within the specific age group and income level) on the number of women who have family planning (FP) services available through all other health insurance programs (Medicaid, BadgerCare, and private health insurance). It is primary for the State to identify the existing population who already have access to health insurance that includes FP before assessing that a need exists to extend Medicaid services for FP services. After carving out these groups of women, please provide the most updated information on the number of women who will be eligible for the demonstration.
- Please clarify that when the State identifies their current waiver population, all data that relates to the 11-14 (inclusive) age group is specifically excluded from the base data and projections used to determine whether the waiver is budget neutral.
- Please provide information on the number of enrollees receiving FP services through Title V, Title X, and Wisconsin's Family Planning Program for the same 12-month base period stated above, April 1, 2000 through March 31, 2001.

BUDGET NEUTRALITY

Responses 1 and 2:

- In FP demonstrations, we use the most recent year **as** a base year. The 12-month base year period of data that we will use for budget neutrality is April 1, 2000 through March 31, 2001. Please revise your data based on this more recent year. The data that you used was based on 1994-1996 data, which is outdated.
- The State's without waiver estimates are based on a birthrate extrapolated **from** 1996 national data. For budget neutrality purposes, we base a State's without waiver baseline on the actual State birthrate for women at this income level. Please provide retroactive data (5-years from FFY 2000) on births to women at this income level.
- Our budget neutrality provisions require that the State obtain birth rate data from its Office of Health Statistics. If the FP demonstration is approved, some of this data will be due very shortly after approval, so we need assurances that the State will be able to access this information in a timely manner. Please provide these assurances (e.g., a data sharing schedule or process to allow for timely data sharing, or a letter from the State Office of

Health Statistics indicating that this data will be readily available). We are concerned about the lack of data on State birthrates in the budget neutrality worksheet.

- Please clarify what is included in the “other child costs” on the budget neutrality worksheet.

ELIGIBILITY/PRESUMPTIVE ELIGIBILITY (PE)

Response 6:

- Please clarify “Claiming of FFP for services provided to women who are certified as presumptively eligible in error is consistent with any other case incorrectly certified eligible for MA.”

Response 7:

- Please clarify the term “reduce” regarding the State will “reduce verification requirements for this program.”

OTHER

- We have noted that the impact of welfare reform on the birth rate has been addressed in your proposal. Please be advised that your evaluation will have to be designed in such a way that the impact of this project is isolated from other initiatives occurring in the State (e.g. welfare reform).

02/08/2001